

REMARKS

1. Claim Status

Claims 1-31 remain pending with claims 1, 11, 20, and 25 being independent.

2. Rejection of Claim 31

Claim 31 is a dependent claim of the system module recited in claim 1. In particular, Claim 31 recites that the module's switching device that couples serverlets to I/O resources is a many-to-one switching device. To illustrate, FIG. 5 of the application depicts a 4:1 switching unit 122 that couples the serverlets 112-118 to a bus such as a SCSI bus (see also FIG. 7).

The Examiner rejected claim 31 by stating the crossbar switch (FIG. 3, item 201) of Matsunami (U.S. 6,542,961) is a many-to-one switch. The crossbar switch in Matsunami, however, is a classic example of a conventional crossbar switch that includes multiple inputs and multiple outputs. That is, the crossbar switch is a many-to-many switch not a many-to-one switch. For example, as shown in FIG. 3 of Matsunami, the switch 201 connects 4-inputs to 4-outputs by altering paths within the crossbar switch 201.

The Examiner further identifies FIG. 18 as depicting a many-to-one switch. FIG. 18, however, is a depiction of a GUI (graphical user interface) that enables an administrator to manage the system, for example, by drawing lines permitting connectivity between different hosts and logical units. The presentation of the user interface, however, does not alter the fact that the connections in Chow are directed

through a many-to-many crossbar switch not a many-to-one switch as recited by claim

31. In fact in the example shown in FIG. 18, the manager has configured the diskarray system to connect 4-hosts to 7-logical units. This, again, reflects the many-to-many crossbar architecture of Matsunami.

For at least the reasons above, Applicant requests withdrawal of the Examiner's rejection of claim 31.

3. Rejection of Independent Claims 1, 11, 20, and 25

Independent claim 1 recites a module that includes a switch to couple serverlets to a switch fabric. The Examiner has rejected these claims based on a combination of Chow (U.S. 6,148, 349) and Matsunami (U.S. 6,542,961). In particular, the Examiner identified item 802 in FIG. 8 of Chow as the switch coupling the serverlets to a switch fabric. FIG. 8 of Chow, however, depicts each node connecting to its own interface 802 (e.g., compute node A connects to the "top" interface box in FIG. 8 while ION 212 connects to the "bottom" interface box). Since each ION 212 is depicted as having its own interface 802, the depicted interface could not switch between IONs. Or more relevant to claim 1, if each ION has its own interface, how can the interface provide a switch to couple **multiple** serverlets to a switch fabric? Supporting this interpretation of Chow is that statement that, since the IONs are physically separate computers, they must communicate over the switch fabric (col. 38, lines 32-38). Presumably, if the IONs shared an interface they could communicate via the interface rather than resorting to communication over the fabric.

In short, based on FIG. 8, it appears that interface 802 connects a **single** ION to a switch fabric, not a switch that couples multiple serverlets to a switch fabric as recited by claim 1. Thus, Applicants request withdrawal of the rejection of claim 1 and its corresponding dependent claims.

Independent claims 11, 20, and 25 each include a similar limitation of a switch that couples multiple serverlets to a switch fabric. In each rejection of these independent claims, the Office Action relies on an assertion that Chow discloses a switch that couples serverlets to a switch fabric. Thus, for at least the reasons above, Applicant also requests withdrawal of the rejection of independent claims 11, 20, and 25 and their corresponding dependent claims.

4. Previously Presented Arguments

Over the course of prosecution, Applicant has made a variety of arguments regarding proposed combinations of the references. For brevity, Applicant has not reproduced these arguments in this response, Applicant, however, continues to disagree with the proposed combinations for previously stated reasons.

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